

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
SYMMETRY PRODUCTS GROUP,

Plaintiff,

- against -

IRON WORKERS LOCAL UNION NO.
417, IRON WORKS LOCALS 40, 361
& 417 UNION SECURITY FUNDS,

Defendant.
-----X

Civil Action No.: 08-CV-3183

ANSWER

Respondents, **IRON WORKERS LOCAL UNION NO. 417, ("LOCAL 417" or "UNION"),
IRON WORKERS LOCALS 40, 361 and 417 UNION SECURITY FUNDS ("FUNDS")** by their
attorney, **COLLERAN, O'HARA & MILLS L.L.P.**, hereby ANSWER the allegations contained in the
Amended Petition of **SYMMETRY PRODUCTS GROUP ("SYMMETRY")** as follows:

FIRST: Admit the allegations contained in the FIRST paragraph, except denies any knowledge
or information sufficient to form a belief as to Petitioner's business operations. Upon information and
belief, Petitioner is in the construction industry.

SECOND: Admit the allegations contained in the SECOND paragraph.

THIRD: Admits that the Union delivered an Agreement that, when executed by Petitioner bound
it to the terms and conditions of the CBA.

FOURTH: Deny knowledge or information sufficient to form a belief as to the allegations
contained in the FOURTH paragraph except that the individual who executed the CBA, Gloria Fornier,
represented that she was authorized and thereafter, for a time, Petitioner acted in conformity with the
CBA.

FIFTH: Admit the allegations contained in the FIFTH paragraph.

SIXTH: Admit the allegations contained in the SIXTH paragraph.

SEVENTH: The allegations contained in the SEVENTH paragraph are a recitation of a statute
that is in applicable herein.

EIGHTH: Deny the allegations contained in the EIGHTH paragraph.

NINTH: Deny the allegations contained in the NINTH paragraph as Petitioner sought, and was granted at least one adjournment of the arbitration hearing.

TENTH: Deny the allegations made in the TENTH paragraph.

ELEVENTH: Admit that Steven Lancia contacted Colleran, O'Hara & Mills L.L.P. and deny all other claims made in the ELEVENTH paragraph.

TWELFTH: Admit that Colleran, O'Hara & Mills L.L.P. intends to move forward in obtaining a judgment against Petitioner and deny all other claims made in the TWELFTH paragraph.

THIRTEENTH: Deny all allegations contained in the THIRTEENTH paragraph.

FOURTEENTH: Admit the allegations made in the FOURTEENTH paragraph.

Dated: Garden City, New York
April 14, 2008

COLLERAN, O'HARA & MILLS L.L.P.

By: 
DENIS A. ENGEL

Attorney for Defendant
1225 Franklin Avenue, Suite 450
Garden City, New York 11530
(516) 248-5757

TO: **TOM LANCIA, ESQ.**
Attorney for Plaintiff
217 Broadway, Suite 608
New York, New York 1007